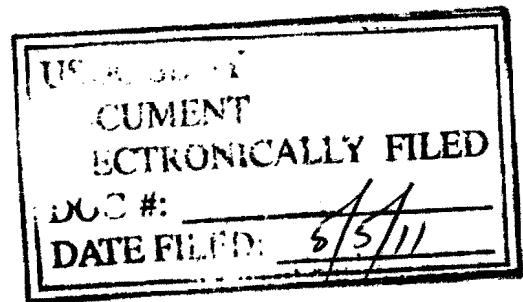


MAILED TO COUNSEL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



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UNITED STATES OF AMERICA

- against -

JAIRO DE JESUS RENDON-HERRERA,

a/k/a "J,"

Defendant.

**FACTUAL ALLEGATIONS
IN SUPPORT OF
JUDICIAL REMOVAL**

S4 04 Cr. 962 (LAP)

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NOTICE IS HEREBY GIVEN TO JAIRO DE JESUS RENDON-HERRERA ("the defendant") and to his attorney of record herein, Jeffrey Michael Cohn, Esq., that the United States of America alleges the following facts in support of the Notice of Intent to Request Judicial Removal:

1. The defendant is not a citizen or national of the United States.
2. The defendant is a native of Colombia and citizen of Columbia.
3. The defendant was paroled into the United States on or about July 31, 2009 from Panama.
4. At the time of sentencing in the instant criminal proceeding, the defendant will be convicted in this Court of violations of Title 18 United States Code, Sections 1956(a)(1)(B)(i), and (h) (money laundering conspiracy).
5. A maximum sentence of 20 years' imprisonment may be imposed for a violation of 18 U.S.C. § 1956(a)(1)(B)(i).
6. The defendant is and at sentencing will be subject to removal under section

212(a)(7)(A)(i)(I) of the Immigration and Nationality Act of 1952, as amended ("INA"), 8 U.S.C. § 1182(a)(7)(A)(i)(II), as an immigrant who, at the time of application for admission, is not in possession of a valid nonimmigrant visa or border crossing card identification card; and under section 212(a)(2)(A)(i)(I) of the Immigration and Nationality Act of 1952, 8 U.S.C. § 1182(a)(2)(A)(i)(I), as amended, as an alien who has been convicted of, or who admits having committed, or who admits committing acts which constitute the essential elements of a crime involving moral turpitude (other than a purely political offense) or an attempt or conspiracy to commit such a crime.

WHEREFORE, pursuant to section 238(c) of the INA, 8 U.S.C. § 1228(c), the United States requests that the Court, at the time of sentencing, order that the defendant be removed from the United States to Panama or, in the alternative, to Colombia, promptly upon his release from confinement, or, if the defendant is not sentenced to a term of imprisonment, promptly upon his sentencing.

Dated: New York, New York
May 5, 2011

PREET BHARARA
United States Attorney
Southern District of New York

By:



Jocelyn Strauber
Assistant United States Attorney